## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, HOLTZBRINCK PUBLISHERS, LLC, D/B/A MACMILLAN, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company, CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

Case No. 1:22-cv-02435-AT

#### AFFIDAVIT OF DWAYNE K. GOETZEL

- I, Dwayne K. Goetzel, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned action as counsel *Pro Hac Vice* for Defendant Tracy Deebs-Elkenaney P/K/A Tracy Wolff.
  - I, Dwayne K. Goetzel, being duly sworn, do hereby depose and say as follows:
  - 1. I am a shareholder at Kowert, Hood, Munyon, Rankin & Goetzel, P.C.
  - I am a member in good standing of the bars of Texas State bar, Southern District of
    Texas, Northern District of Texas, Eastern District of Texas, Western District of Texas,
    and the Court of Appeals Federal Circuit.
  - 3. I am attaching all the certificates of Good Standing as Exhibit A.
  - 4. There are no pending disciplinary proceedings against me in any state or federal court.

- 5. I have never been convicted of a felony
- 6. I have never been censured, suspended, disbarred, or denied admission or readmission by any the foregoing courts.

I certify and attest, under penalty of perjury as prescribed in 28 U.S.C. § 1746, that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: September 27, 2022

Respectfully submitted

Dwayne K. Goetzel

Kowert, Hood, Munyon, Rankin &

Goetzel, P.C.

1120 S. Capital of Texas Hwy.

Building 2, Suite 300

Austin, TX 78746

Telephone: (512) 853-8800

Facsimile: (512) 853-8801

dgoetzel@intprop.com

Counsel for Defendant Tracy Deebs-

Elkenaney p/k/a Tracy Wolff

Subscribed and sworn to before me this 27th day of September 2022.

My Commission Expires:

LESLIE WALTER HAAS
Notary ID #7023972
Ay Commission Expires
October 21, 2024

**Notary Public** 

# **EXHIBIT A**

## STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

September 09, 2022

Re: Mr. Dwayne Keith Goetzel, State Bar Number 08059500

To Whom It May Concern:

This is to certify that Mr. Dwayne Keith Goetzel was licensed to practice law in Texas on November 01, 1991, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing

Chief Disciplinary Counsel

SW/web



#### **United States District Court Southern District of Texas**

#### **Certificate of Good Standing**

I, Nathan Ochsner, Clerk of Court, United States District Court for the Southern District of Texas, certify that the attorney identified below is admitted to practice in this court, and is in good standing as a member of the Bar of this Court.

Dwayne Keith Goetzel, Federal ID No 22918

Admission date: December, 8, 1998

Dated September 9, 2022, at Houston, Texas.

Nathan Ochsner, Clerk of Court

By: Heather McCalip, Deputy Clerk

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## U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS

#### CERTIFICATE OF GOOD STANDING

I, Karen Mitchell, Clerk of the U.S. District Court for the Northern District of Texas, certify that the attorney named below is admitted to practice before this court and is currently in good standing:

#### **DWAYNE K GOETZEL**

Bar Number: Date of Admission:

0805900 02/06/1998

Witness my official signature and the seal of this court.

Dated: September 8, 2022 Karen Mitchell, Clerk of Court

 $_{\mbox{\footnotesize By:}}$  /s/ L. Waits

Deputy Clerk



### UNITED STATES DISTRICT COURT

for the
Eastern District of Texas

#### CERTIFICATE OF GOOD STANDING

Ι,	I, DAVID A. O'TOOLE				, Clerk of this Court,	
certify that	Dwayne Keith Go	etzel	, Bar #	8059500		
was duly admitted t	to practice in this Court on	October 23,	1998	and is in good s	standing as a member	
of the Bar of this C	ourt.					
Dated at Ty	ler, Texas on September 19, 2	022.				
		)				
					NTES DISTRICE	
DAVID A. O'	TOOLE	DE	Bulinder of EPUTY CLERK	Saen S		

## Certificate of Good Standing

United States District Court
Western District of Texas

I, PHILIP J. DEVLIN, Clerk of the United States District Court, Western District of Texas, DO HEREBY CERTIFY that Dwayne K. Goetzel, Bar #08059500, was duly admitted to practice in said Court on 6/12/1997, and is in good standing as a member of the bar of said Court.

Signed at San Antonio, Texas on 9/8/2022.



PHILIP J. DEVLIN, Clerk

BY:

# United States Court of Appeals for the Federal Circuit

Certificate of Good Standing

I, Peter R. Marksteiner-Elerkopf Court, certify that

Pwayne R. Goetzel

was duly admitted to practice in this court on January 11, 2002, and is in good standing as a member of the bar of this court.

Dated at: 717 Madison Place, N.W.

Washington, DC

Peter R. Marksteiner

Clerk of Court

On: September 09, 2022

By: M

Deputy Clerk

This Certificate is valid for 90 days from the date issued